



Federal Communications Commission
Washington, D.C. 20554

April 2, 2008

General Manager WRAL-TV
Capitol Bldg. Co.
Station WRAL-TV
Box 12000
Raleigh NC 27605

Dear Licensee:

1. In accordance with the provisions of 47 C.F.R. § 73.2080(f)(4) of the Commission's Equal Employment Opportunity ("EEO") rules, the station employment unit (the "Unit") that includes your above-referenced station (the "Station") has been randomly selected for an audit of its EEO program. (A copy of Section 73.2080 of the Commission's rules is enclosed for your reference.)
2. If the Unit is not required under our rules to have an EEO recruitment program due to the size of its full-time workforce (having fewer than five full-time employees, defined as employees regularly assigned to work 30 hours a week or more), you must still respond to this audit letter. However, in your response, you must provide only a list of the Unit's full-time employees, noted by job title and the number of hours each is regularly assigned to work per week, and a response to Question 3(e) below. Also, in formulating your response, please see Questions 4(a) and (b) below regarding brokers and brokered stations, for instructions in situations in which the applicable employment unit has fewer than five full-time employees.
3. **Audit Data Requested.** If the Unit employs five or more full-time employees, provide the following information in your response to this letter, including an explanation regarding any requested information that you are unable to provide:
 - (a) The Unit's two most recent EEO public file reports, described in 47 C.F.R. § 73.2080(c)(6). For any stations in the Unit that have websites, provide each web address. If the Unit's most recent EEO public file report is not included on or linked to each of these websites, in violation of that subsection, indicate each station involved and provide an explanation of why the report is not so posted or linked.
 - (b) For each Unit full-time position filled during the period covered by the above EEO public file reports, or since your acquisition of the Station, if after that period, dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position, as described in 47 C.F.R. § 73.2080(c)(5)(iii). Include copies of all job announcements sent to any organization (identified separately from other sources) that has notified the Unit that it wants to be notified of Unit job openings, as described in 47 C.F.R. § 73.2080(c)(1)(ii).
 - (c) In accordance with 47 C.F.R. § 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time Unit vacancies filled during the period covered by the above-noted EEO public file reports.
 - (d) Documentation demonstrating performance of Unit recruitment initiatives described in 47 C.F.R. § 73.2080(c)(2) during the periods covered by the above-noted EEO public file reports, such as participation at job fairs, mentoring programs, and training for staff. Specify the Unit personnel involved in each such recruitment initiative. Also, provide the total number of full-time

employees of the Unit and state whether the population of the market in which the stations included in the Unit operate is 250,000 or more. Based upon these two factors, determine and state whether the Unit is required to perform two or four initiatives within a two-year period, pursuant to 47 C.F.R. §§ 73.2080(c)(2) and (c)(3).

(e) Disclose any pending or resolved complaints involving the Station filed during the Station's current license term before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or sex. For each such complaint, provide: (1) a brief description of the allegations and issues involved; (2) the complainant and other persons involved; (3) the date of the complaint's filing; (4) the court or agency before which it is pending or was resolved; (5) the file or case number; and (6) the disposition and date thereof or current status. Note that all complaints must be reported, regardless of their status or disposition.

(f) In accordance with 47 C.F.R. § 73.2080(b), for the period from March 10, 2003 (or from the first day of the Station's current license term, if after that date) until the date of this letter, describe the responsibilities of each level of Unit management to ensure enforcement of Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.

(g) In accordance with 47 C.F.R. § 73.2080(c)(3), for the period from March 10, 2003 (or from the first day of the Station's current license term, if after that date) until the date of this letter, describe the Unit's efforts to analyze its EEO recruitment program to ensure that it is effective and address any problems found as a result of such analysis.

(h) In accordance with 47 C.F.R. § 73.2080(c)(4), for the period from March 10, 2003 (or from the first day of the Station's current license term, if after that date) until the date of this letter, describe the Unit's efforts to analyze periodically its measures taken to examine pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that they provide equal opportunity and do not have a discriminatory effect, and if the Unit has one or more union agreements, describe how the Unit cooperates with each union to ensure EEO policies are followed for the Unit's union-member employees and job applicants.

(i) If your entity is a religious broadcaster and any of its full-time employees are subject to a religious qualification as described in 47 C.F.R. § 73.2080(a) of the rules, so indicate in your response to this letter and provide data as applicable to the Unit's EEO program. For example, for full-time hires subject to a religious qualification, only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source of the hiree must be maintained. No other records would be required for those hires. If five or more full-time positions are not subject to a religious qualification, the licensee must maintain all records for such hires and complete the initiatives required under 47 C.F.R. § 73.2080(c)(2). Otherwise, a religious broadcaster is not required to perform these initiatives.

4. Time Brokerage.

(a) **Brokered station(s).** If the Unit employs fewer than five full-time employees and any station included in it is subject to a time brokerage agreement, in addition to responding to this letter and providing us a list of the Unit's full-time employees listed by job title (and the number of hours each employee is assigned to work) and a response to question 3(e) above, you must immediately forward a copy of this letter to the broker under each such agreement, which must also respond to Question 4(b) below.

(b) **Brokers.** The broker of any Unit station referenced above must supply the Commission with the information requested herein regarding the broker's full-time employees who work at each such brokered station. If this letter is addressed to you requesting data about a station licensed to you, and you also broker a station in another employment unit, you must send us the information requested herein for each of your stations and your full-time employees at each brokered employment unit, if the recruitment data for any such brokered unit is included with that for your own station referenced above. *See* 47 C.F.R. § 73.2080(f)(3). If your employees at your own station(s), combined with your employees at the station(s) you are brokering, total fewer than five full-time employees, however, you need not provide such information. Instead, you must respond to this letter by the deadline described below by providing us with a list of your station unit's full-time employees (listed by job title and number of hours regularly assigned to work per week) and the same type of list for the full-time employees you employ at the brokered station(s), and a response to Question 3(e) above

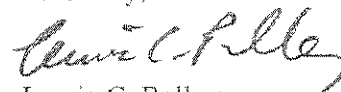
5. **Procedures.** All responses must be postmarked within thirty (30) calendar days from the date of this letter. The response must be in the form of a statement signed by an officer, partner or other principal of the Station licensee or broker or, in the case of a noncommercial educational station, by an officer, member or other principal of the licensee. Send the response to EEO Staff, Policy Division, Media Bureau, Federal Communications Commission, 445 12th Street, S.W., Washington, DC 20554. To knowingly and willfully make any false statement or conceal any material fact in response to this audit is punishable by fine or imprisonment (*see* 18 U.S.C. § 1001; *see also* 47 C.F.R. § 1.17), revocation of any station license or construction permit (47 U.S.C. § 312(a)(1)), and/or forfeiture (47 U.S.C. § 503). Failure to respond to this audit letter by the deadline is also punishable by sanctions in accordance with 47 C.F.R. § 73.2080(g).

6. In accordance with 47 C.F.R. § 73.3526(e)(10) (for commercial stations) and 47 C.F.R. § 73.3527(e)(11) (for noncommercial educational stations), copies of which are also enclosed, you are required to place a copy of this letter and your response in the public inspection file of each affected station. Consequently, your response should not include personal information about individuals, such as social security numbers, home addresses, or other personally identifiable information. We do not require that employment units retain such information in their records, or that such information be provided in response to this letter.

7. If our EEO random audits sent in 2006 or 2007 included the Station, or if the Station's most recent license renewal application was granted, by final order, within the past 18 months, you may not have to provide a response to this letter. If you believe that the Station falls within one of these categories, before responding to this letter, please so state in an e-mail, providing the specifics of the audit or renewal, sent to the undersigned at lewis.pulley@fcc.gov. Upon receipt of this information, we will advise you if a response is necessary under the circumstances.

Should you have any questions regarding this matter, please contact the EEO Staff at (202) 418-1450. Thank you for your cooperation.

Sincerely,



Lewis C. Pulley
Assistant Chief, Policy Division
Media Bureau

Enclosure

Please Date Stamp and Return To
HOLLAND & KNIGHT LLP



COVERAGE YOU CAN COUNT ON

Federal Communications Commission
236 Massachusetts Ave., NE, Suite 110
Washington, DC 20002
Attention: EEO Staff, Policy Division, Media Bureau

FILED/ACCEPTED

APR 23 2008

Federal Communications Commission
Office of the Secretary

RE: WRAL-TV Response to EEO Audit Letter

This letter is submitted by Capitol Broadcasting Company, Inc. ("CBC"), the licensee of WRAL-TV, Raleigh, NC (FID 8688) ("WRAL-TV"), in response to the April 2, 2008 letter from Lewis C. Pulley, Assistant Chief, Policy Division, Media Bureau ("FCC Audit Letter"). The letter requests that WRAL-TV provide certain information concerning the station's compliance with the Commission's Equal Employment Opportunity ("EEO") rules.

In response to the information requested in the FCC Audit Letter, WRAL-TV submits the following:

3(a) Provide the employment unit's two most recent EEO public file reports, described in 47 CFR § 73.2080(c)(6). If you station has a website tell us your web address. If your most recent public file report is not included or linked to on the website, in violation of 47 CFR § 73.2080(c)(6), provide an explanation for why it is not there.

Copies of WRAL-TV's two most recent EEO public file reports (August 1, 2005 through July 31, 2006 and August 1, 2006 through July 31, 2007) are attached. WRAL-TV's next EEO public file report will be prepared on or about August 1, 2008. WRAL-TV has a website, www.wral.com, and the station's most recent EEO public file report is available on the website.

3(b) For each full-time position filled during the period covered by the above EEO public file reports, or since your acquisition of the station(s) if more recent, provide dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position, as described in § 73.2080(c)(5)(iii). Include copies of all job announcements sent to any organization (identified separately from other sources) that has notified the Unit that it wants to be notified of Unit job openings, as described in 47 CFR § 73.2080(c)(1)(ii).

For the period August 1, 2005 through July 31, 2006, WRAL-TV filled 22 full-time positions. Copies of all advertisements and other communications used to

advertise those full-time positions (including identified job announcements sent to organizations) are attached.

For the period August 1, 2006 through July 31, 2007, WRAL-TV filled 37 full-time positions. Copies of all advertisements and other communications used to advertise those full-time positions (including identified job announcements sent to organizations) are attached.

3(c) In accordance with § 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time Unit vacancies filled during the period covered by the above-noted EEO public file reports.

Copies of this information for the August 1, 2005 through July 31, 2006 and the August 1, 2006 through July 31, 2007 periods are attached.

3(d) Documentation demonstrating performance of Unit recruitment initiatives described in § 73.2080(c)(2) during the periods covered by the above-noted EEO public file reports, such as participation at job fairs, mentoring programs, and training for staff. Specify the Unit personnel involved in each such recruitment initiative. Also, provide the total number of full-time employees of the Unit and state whether the population of the market in which the stations included in the Unit operate is 250,000 or more. Based upon these two factors, determine and state whether the Unit is required to perform two or four initiatives within a two-year period, pursuant to § 73.2080(c)(2) and (e)(3).

As of April 10, 2008, WRAL-TV employs 183 full-time employees. The Raleigh-Durham (Fayetteville) market, to which WRAL-TV is assigned, has in excess of 1,039,890 households according to Nielsen Media Research, which are greater than 250,000. Documentation demonstrating performance of the required four (4) initiatives, including the names of the station personnel involved, is attached.

3(e) Disclose any pending or resolved complaints involving the Station filed during the Station's current license term before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or sex. For each such complaint, provide: (1) a brief description of the allegations and issues involved; (2) the complainant and other persons involved; (3) the date of the complaint's filing; (4) the court of agency before which it is pending or was resolved; (5) the file or case number; and (6) the disposition and date thereof or current status. Note that all complaints must be reported, regardless of their status or disposition.

The current WRAL-TV license term began on December 1, 2004. During the current license term, WRAL-TV confirms that it has received no complaints, and there are no pending or resolved complaints before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of WRAL-TV on the basis of race, color, religion, national origin or sex.

3(f) In accordance with 47 CFR § 73.2080(b), for the period from March 10, 2003 (or from the first day of the Station's current license term, if after that date) until the date of this letter, describe the responsibilities of each level of Unit management to ensure enforcement of Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.

To ensure that all WRAL-TV employees are aware of CBC's EEO policy and their individual responsibilities, the policy is distributed to all newly hired employees during orientation and the policy is posted in the handbook section of the employee intranet site. In addition, the fact that WRAL-TV is an EEO employer is noted on the station's Careers website, www.jobs.cbc-raleigh.com/connect/, on the WRAL-TV website, www.wral.com, on all job announcements and advertisements.

Annually, the WRAL-TV EEO policy and Productive Work Environment (anti-harassment) policy is distributed to all levels of management. In July and August 2006, all managers and supervisors participated in a corporate training program, **Basic Workplace Laws**, where the EEO and Productive Work Environment policies were discussed. The program was designed to ensure that all managers understand WRAL-TV's EEO policies and their responsibilities for the implementation of and compliance with the FCC's EEO requirements. Managers are expected to ensure that equal employment opportunity is afforded to all applicants for positions with WRAL-TV and to all employees. Should a concern of complaint regarding EEO arise, managers are expected to address the complaint, notify the human resources department of such complaint, and be part of the resolution. WRAL-TV's human resources department serves as a resource for station management and employees for any EEO matters.

3(g) In accordance with 47 CFR § 73.2080(c)(3), for the period from March 10, 2003 (or from the first day of the Station's current license term, if after that date) until the date of this letter, describe the Unit's efforts to analyze its EEO recruitment program to ensure that it is effective and address any problems found as a result of such analysis.

WRAL-TV reviews recruitment effectiveness periodically to ensure that job listings are being distributed in an effective manner while complying with WRAL-TV's EEO policies and Commission rules. When necessary, changes to the recruitment sources are made. Should recruitment sources no longer wish to

receive station job postings, they are removed. If recruitment sources would like to begin receiving job postings, their information is added to the system and they are sent job postings. On a regular basis, outreach activities are reviewed to ensure that WRAL-TV is using resources effectively while fulfilling its ongoing commitment to informing individuals about broadcasting careers and job opportunities within WRAL-TV.

3(h) In accordance with 47 CFR § 73.2080(c)(4), for the period from March 10, 2003 (or from the first day of the Station's current license term, if after that date) until the date of this letter, describe the Unit's efforts to analyze periodically its measures taken to examine pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that they provide equal opportunity and do not have a discriminatory effect, and if the Unit has one or more union agreements, describe how the Unit cooperates with each union to ensure EEO policies are followed for the Unit's union-member employees and job applicants.

Benefit plans are reviewed annually by WRAL-TV's human resources department to ensure they are not improperly discriminatory and are provided equally to eligible employees. In addition, WRAL-TV's human resources department periodically audits full-time positions for compliance with the Fair Labor Standards Act and pay parity. The human resources department also conducts periodic salary reviews for various positions to ensure salaries are within industry/market standards and for internal consistency. The employment process is based on employment interviews, references, and qualifications. Promotions, when made, are based on job performance and employee qualifications. In most cases, pay increases are contingent upon an annual performance review. In certain instances, an increase may be given when there is a disparity between current pay for the position and industry/market standards. WRAL-TV has a number of long-term employees, who are valuable to the station; however, seniority does not factor into salary or benefits. WRAL-TV currently has no union agreements.

3(i) If your entity is a religious broadcaster and any of its full-time employees are subject to a religious qualification as described in 47 CFR § 73.2080(a) of the rules, so indicate in your response to this letter and provide data as applicable to the Unit's EEO program. For example, for full-time hires subject to a religious qualification, only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source of the hiree must be maintained. No other records would be required for those hires. If five or more full-time positions are not subject to a religious qualification, the licensee must maintain all records for such hires and complete the initiatives required under 47 CFR § 73.2080(c)(2). Otherwise, a religious broadcaster is not required to perform these initiatives.

WRAL-TV is not a religious broadcaster.

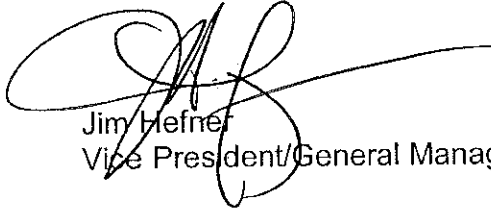
4(a)-(b) Time Brokerages

WRAL-TV is not subject to a time brokerage agreement.

A copy of the FCC's Audit Letter and this response will be placed in the station's public inspection file.

Should you have any questions concerning this EEO audit response, please contact our legal counsel, David O'Connor of Holland & Knight LLP in Washington, DC, at 202-828-1889.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jim Hefner", with a long horizontal flourish extending to the right.

Jim Hefner
Vice President/General Manager, WRAL-TV

5283917_v2



Federal Communications Commission
Washington, D.C. 20554

SEP 26 2008

Jim Hefner, Vice President/General Manager
WRAL-TV
Box 12000
Raleigh, NC 27605

Re: WRAL-TV, Raleigh, NC
Facility ID # 8688

Dear Mr. Hefner:

We have completed our review of the response of Capitol Broadcasting Company, Inc., licensee of the above-noted station, to the April 2, 2008 random audit letter sent to it in accordance with the provisions of Section 73.2080(f)(4) of the Commission's Equal Employment Opportunity (EEO) rules. As a result of our review, we find that no further action is required. In accordance with Section 73.3526(e)(10) of the Commission's rules for commercial stations or Section 73.3527(e)(11) for non-commercial stations, Capitol Broadcasting Company, Inc. must place copies of this letter, our April 2 audit letter, and its response in the station's public inspection file. Capitol Broadcasting Company, Inc. must maintain these materials in the file until grant, by final order, of its next renewal application of its license for the station.

Should you have any questions regarding this matter, please contact the EEO Staff at (202) 418-1450. Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, which appears to read "Roy J. Stewart", is written over a horizontal line.

Roy J. Stewart
Senior Deputy Chief, Media Bureau